

# **EXHIBIT A**

*Mango v. BuzzFeed*, 17-cv-6784 (VM)

**TIME ENTRIES:**  
**James H. Freeman**

Date	Description	Hrs.
9/6/17	• Registration diligence; take screenshots of infringing articles; research BuzzFeed corporate background	2.5
	• Draft and File Complaint	1.5
9/8/17	• Arrange and confirm service of process	0.25
9/18/17	• Arrange amended service of process	0.10
10/30/17	• Research other infringement lawsuits vs. BuzzFeed; research other news articles re: Raymond Parker	0.5
10/6/18	• E-mail w/ opposing counsel re: extension of time	.10
11/8/18	• Review / take notes re: Answer to complaint	0.50
11/21/17	• Prepare litigation statement for Copyright Office	0.25
11/22/17	• Draft and file Amended Complaint	.75
12/6/17	• Review / take notes re: Answer to amended complaint	0.5
12/8/17	• Draft joint letter to Court re: initial case management	1.25
1/22/18	• Review Magistrate Order / mediation rules	0.25
2/1/18	• Draft mediation statement and acknowledgement form to Magistrate Judge	2.75
2/5/16	• Meeting w/ Mango re: mediation preparation	1.0
2/6/18	• Attend Mediation Session w/ Mag. Judge Fox	2.25
	• Research / draft letter motion for pre-motion conference re: judgment on the pleadings under Rule 12(c)	3.5

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Date	Description	Hrs.
2/8/18	• Review / take notes re: BuzzFeed response to pre-motion letter	0.5
2/22/18	• Draft reply in further support of letter motion – judgment on the pleadings	0.75
3/8/18	• Review BuzzFeed’s third-party subpoena to NY Post	0.50
3/14/18	• Draft and research Plaintiff’s Rule 26(a) disclosures	0.50
	• Draft Plaintiff’s First Set of Requests for Production of Documents	1.25
	• Draft Plaintiff’s First Set of Interrogatories	0.75
5/2/18	• Review Court Order re: Rule 12(c) motion	0.25
5/16/18	• Review BuzzFeed letter to Court re: reconsideration of Rule 12(c)	0.10
5/18/18	• Review letter from BuzzFeed re: request for adjournment of conference	0.10
5/21/18	• Draft letter to Court: bench trial and summary judgment	0.50
5/22/18	• Draft letter to BuzzFeed re: BuzzFeed document deficiencies; testimony concerning BuzzFeed size/assets	.50
5/23/18	• Review letter from BuzzFeed re: bench trial	0.25
5/24/18	• Draft Plaintiff’s First Set of Requests for Admissions	2.75
5/25/18	• Draft letter to Court re: bench trial	0.25
5/29/18	• Review BuzzFeed’s First Set of Requests for the Production of Documents	1.25
5/30/18	• Draft letter to BuzzFeed re: Rule 37 deficiencies; trial testimony, deposition dates	0.50

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Date	Description	Hrs.
5/31/18	• Compile evidence re: Hayes' work experience	1.25
	• Draft Plaintiff's Second Rule 26(e) Supplemental Disclosures	0.75
	• Review Defendant's document production	0.50
6/1/18	• Draft Plaintiff's segment of Joint pre-trial order	3.5
	• Review Plaintiff's document production; Draft Plaintiff's Exhibit List	1.5
6/2/18	• Prepare documents for production to BuzzFeed	2.5
	• Draft Plaintiff's Proposed Findings of Fact, Conclusions of Law; Memorandum of Law	6.5
6/3/18	• Continue drafting / researching Plaintiff's Proposed Findings of Fact, Conclusions of Law; Memorandum of Law	7.25
	• Continue drafting Plaintiff's segment of Joint pre-trial order	3.75
6/4/18	• Continue drafting Plaintiff's Proposed Findings of Fact, Conclusions of Law; Memorandum of Law	6.5
	• Continue drafting segment of Joint pre-trial order	2.5
	• Research BuzzFeed's net worth	0.75
	• Review / take notes BuzzFeed's Pre-Trial Memorandum of Law; Proposed Findings of Fact and Conclusions of Law	2.75
	• Review Defendant's document production	0.50
	• Draft proposed Stipulation of facts	1.50
6/6/18	• Review BuzzFeed motion in limine to exclude evidence concerning BuzzFeed's financial information	1.25

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Date	Description	Hrs.
	<ul style="list-style-type: none"> <li>Draft letter to BuzzFeed re: trial testimony, production of documents, stipulation of facts</li> </ul>	0.5
	<ul style="list-style-type: none"> <li>Review BuzzFeed's motion in limine to exclude irrelevant and cumulative witness testimony</li> </ul>	0.75
6/8/18	<ul style="list-style-type: none"> <li>Review BuzzFeed letter re: outstanding document production.</li> </ul>	0.10
	<ul style="list-style-type: none"> <li>Draft party subpoenas re: Hayes, Yaqubi, BuzzFeed Corp. Rep.</li> </ul>	1.25
	<ul style="list-style-type: none"> <li>Draft and research third-party subpoena re: Liane Fisher</li> </ul>	2.75
	<ul style="list-style-type: none"> <li>Draft letter to BuzzFeed re: party subpoenas; Hayes' trial availability</li> </ul>	0.25
6/11/18	<ul style="list-style-type: none"> <li>Draft letter to BuzzFeed re: deficient discovery responses</li> </ul>	0.75
6/11/18	<ul style="list-style-type: none"> <li>Research and draft Plaintiff's Memorandum of Law in Opposition to Defendant's motions in Limine #1 and #2</li> </ul>	3.75
6/12/18	<ul style="list-style-type: none"> <li>Research and draft Plaintiff's Memorandum of Law in Opposition to Defendant's motions in Limine #1 and #2</li> </ul>	2.5
6/13/18	<ul style="list-style-type: none"> <li>Research and draft Plaintiff's Memorandum of Law in Opposition to Defendant's motions in Limine #1 and #2</li> </ul>	5.5
6/14/18	<ul style="list-style-type: none"> <li>Compile Mango's licensing fee history</li> </ul>	1.75
6/15/18	<ul style="list-style-type: none"> <li>Draft letter response re: discovery deficiencies</li> </ul>	0.5
6/18/18	<ul style="list-style-type: none"> <li>Review BuzzFeed's reply in further support of motion in limine</li> </ul>	0.5

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Date	Description	Hrs.
6/22/18	• Review Liane Fisher's response to third-party subpoena	0.50
6/25/18	• Review / take notes re: BuzzFeed's responses and objections to Mango's first set of requests to admit	0.50
7/5/18	• Review BuzzFeed letter re: outstanding document production	0.25
7/9/18	• Draft letter to BuzzFeed re: discovery deficiencies	1.75
7/12/18	• Review documents for production	2.25
7/13/18	• Draft and research Plaintiff's Amended Proposed Findings of Fact and Conclusions of Law	4.5
	• Review / take notes re: BuzzFeed's Amended Pre-Trial Memo of Law	1.25
	• Draft Donna Halperin declaration	1.75
	• Draft Mango's licensing fee analysis	1.25
7/16/18	• Revise Party Subpoenas for new trial date	0.75
7/19/18	• Review Decision and Order re: motions in limine	0.5
	• Draft outline for pre-trial conference	0.75
7/23/18	• Draft letter to Court re: request to file amended pre-trial memorandum of law	0.25
7/27/18	• Draft Stipulation Before Trial	0.50
8/2/18	• Draft letter to court re: trial technology	0.25
	• Compile key citations from Mango's deposition transcript	3.75
	• Prepare Plaintiff's trial exhibits	6.25

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Date	Description	Hrs.
8/3/18	• Review letter from Buzzfeed to Court re: alternate trial witnesses	0.10
	• Draft Plaintiff's Exhibit List	1.5
8/6/18	• Draft letter to Court re: alternate trial witnesses	0.5
	• Review Buzzfeed's deposition designations	0.75
8/8/18	• Draft letter to Court re: order of trial witness appearances	0.25
	• Draft chronology of events	2.25
8/9/18	• Draft and research witness outline re: Mango	7.25
8/10/18	• Draft and research witness outline re: Gregory Brehm	3.25
	• Draft and research witness outline re: Michael Hayes	7.5
8/11/18	• Draft and research witness outline re: Liane Fisher	3.75
	• Revise witness outline re: Mango	2.5
	• Meeting w/ Mango re: trial preparation	3.5
8/12/18	• Research and draft bench memoranda re: hearsay, foundation, remedial measures, CMI, fair market value	4.5
	• Draft and research closing statement	3.75
	• Draft opening statement	0.50
	• Revise witness outlines re: Mango, Brehm, Fisher, Hayes	4.5
8/13/18	• Attend Bench Trial	5.5
8/27/18	• Draft Plaintiff's statement re: settlement status	0.10

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
10/8/18	• Review BuzzFeed letter to Court: section 1202 / <i>Krechmer</i> ; Review <i>Krechmer</i>	0.75
10/11/18	• Research and Draft letter to Court re: sec. 1202 / <i>Krechmer</i>	2.50
	<b>TOTAL</b>	<b>174.95</b>